

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

TIFFANY SARGENT, BAILEY  
CRYDERMAN, SAMANTHA L. IGNACIO  
(formerly SCHNEIDER) VINCENT M.  
IGNACIO, HUONG (“ROSIE”)  
BOGGS, and JACQULYN WIEDERHOLT  
on behalf of themselves and all others  
similarly situated,

Plaintiffs,

v.

HG STAFFING, LLC, MEI-GSR  
HOLDINGS, LLC d/b/a GRAND SIERRA  
RESORT, and DOES 1 through 50,  
inclusive,

Defendants.

Case No.: 3:13-cv-453-LRH-WGC

**STIPULATION AND  
ORDER TO STAY ALL PROCEEDINGS  
FOR 180 DAYS PENDING APPEAL TO  
NINTH CIRCUIT COURT OF APPEALS**

(First Request)

Plaintiffs TIFFANY SARGENT, BAILEY CRYDERMAN, SAMANTHA L. IGNACIO  
(formerly SCHNEIDER), VINCENT M. IGNACIO, HUONG (“ROSIE”) BOGGS, and  
JACQULYN WIEDERHOLT, on behalf of themselves and all others similarly situated  
(hereinafter “Plaintiffs”), and Defendants HG STAFFING, LLC, and MEI-GSR HOLDINGS,  
LLC d/b/a GRAND SIERRA RESORT (hereinafter “Defendants”), by and through their

1 respective counsel of record, hereby stipulates, pursuant to Fed. R. Civ. P. 23(f) and Fed. R. App.  
 2 P. 8(a), to stay all proceedings in the above captioned matter for 180 days. The stay, however,  
 3 shall terminate prior to the expiration of the 180 days if the Ninth Circuit Court of Appeals denies  
 4 Plaintiffs' Petition to Appeal Class Certification Decision Pursuant to Federal Rule of Civil  
 5 Procedure 23(f), ("Plaintiffs' Petition," Doc. 174), which was filed on April 6, 2016; or if  
 6 Plaintiffs' Petition is granted, shall terminate at such time as the appeal is decided. *See* Doc. 178  
 7 (receipt form the Ninth Circuit acknowledging receipt of Plaintiffs' Petition).

8 The purpose of the stay is to promote judicial economy and allow this court to more  
 9 effectively control the disposition of the cases on its docket with economy of time and effort for  
 10 itself, for counsel, and the litigants. *See Landis v. N. Am. Co.*, 299 U.S. 248, 254 (U.S. 1936)  
 11 ("the power to stay proceedings is incidental to the power inherent in every court to control the  
 12 disposition of the causes on its docket with economy of time and effort for itself, for counsel, and  
 13 for litigants"); *Pate v. DePay Orthopedics, Inc.* 2012 WL 3532780, at \* 2 (D. Nev. Aug. 14, 2012)  
 14 ("A trial court may, with propriety, find it is efficient for its own docket and the fairest course for  
 15 the parties to enter a stay of an action before it, pending resolution of independent proceedings  
 16 which bear upon the case"), citing *Leyva v. Certified Grocers of Cal., Ltd.* 593 F.2d 857, 863 (9<sup>th</sup>  
 17 Cir. 1979). Due to Plaintiffs' Petition, issues of class certification have not been fully resolved  
 18 and, therefore, under this Court's bifurcated scheduling order, discovery on the merits should not  
 19 yet commence. Accordingly, the Parties agree to and stipulate as follows:

- 20 1) The above captioned dispute shall be stayed for a period of 180 days commencing  
 21 on April 8, 2016 and ending on October 5, 2016.
- 22 2) If prior to October 5, 2016, the Ninth Circuit Court of Appeals denies Plaintiffs'  
 23 Petition the stay shall terminate on the day the denial is effective;
- 24 3) If Plaintiffs' Petition is granted and the appeal is decided prior to October 4, 2016,  
 25 the stay shall terminate on the day the decision is effective.

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1        4)        If this case is ever consolidated with any other case, this stay shall not apply to the  
2                    case so consolidated, but shall continue to apply the above captioned case until the  
3                    stay expires.

4                    This stipulation is made in good faith and not for the purposes of undue burden or delay.

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6 Dated: April 8, 2016.

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8        THIERMAN BUCK LLP

9        /s/ Leah L. Jones

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16       *Attorneys for Defendants*

17                    **ORDER**

18                    **IT IS SO ORDERED.**

19                    DATED this 11th day of April, 2016.

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21                      
22                    LARRY R. HICKS

23                    UNITED STATES DISTRICT JUDGE  
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